

CLEMENT SETH ROBERTS (STATE BAR NO. 209203)
croberts@orrick.com
BAS DE BLANK (STATE BAR NO. 191487)
basdeblank@orrick.com
ALYSSA CARIDIS (STATE BAR NO. 260103)
acaridis@orrick.com
EVAN D. BREWER (STATE BAR NO. 304411)
ebrewer@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759

SEAN M. SULLIVAN (admitted *pro hac vice*)
sullivan@ls3ip.com
RORY P. SHEA (admitted *pro hac vice*)
shea@ls3ip.com
J. DAN SMITH, III (admitted *pro hac vice*)
smith@ls3ip.com
COLE RICHTER (admitted *pro hac vice*)
richter@ls3ip.com
MICHAEL P. BOYEA (admitted *pro hac vice*)
boyea@ls3ip.com
JAE Y. PAK (admitted *pro hac vice*)
pak@ls3ip.com
LEE SULLIVAN SHEA & SMITH LLP
656 W Randolph St., Floor 5W
Chicago, IL 60661
Telephone: +1 312 754 0002
Facsimile: +1 312 754 0003

Attorneys for Plaintiff Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

SONOS, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE
DOCUMENTS FILED IN SUPPORT OF
SONOS'S THIRD AMENDED
COMPLAINT**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Plaintiff Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos, Inc.’s Third Amended Complaint (“Sonos’s TAC”). Specifically, Sonos seeks to file under seal the information and documents listed below:

| DOCUMENT | PORTIONS TO BE SEALED | DESIGNATING PARTY |
|---------------------------|-----------------------|-------------------|
| Exhibit CD to Sonos’s TAC | Entire Document | Google |
| Exhibit CI to Sonos’s TAC | Entire Document | Google |
| Exhibit CJ to Sonos’s TAC | Entire Document | Google |
| Exhibit CK to Sonos’s TAC | Entire Document | Google |
| Exhibit CL to Sonos’s TAC | Entire Document | Google |
| Exhibit CW to Sonos’s TAC | Entire Document | Google |

II. LEGAL STANDARD

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” *See* L.R. 79-5(f).

III. GOOGLE’S CONFIDENTIAL INFORMATION

Sonos seeks to seal material and documents filed in support Sonos’s TAC because they may contain information that Google, LLC (“Google”) considers Confidential and/or Highly Confidential-Attorneys’ Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order entered by this Court. Dkt. 92. Sonos takes no position on the merits of sealing Google’s designated material, and expects Google to file one or more declarations in accordance with the Local Rules.

IV. CONCLUSION

In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-listed documents accompany this Administrative Motion and redacted versions are filed publicly.

1 A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos
2 respectfully requests that the Court grant Sonos's Administrative Motion.

3
4 Dated: July 8, 2022

By: /s/ Cole B. Richter

Clement Seth Roberts
Bas de Blank
Alyssa Caridis
Evan D. Brewer

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 Sean M. Sullivan (admitted *pro hac vice*)
9 Rory P. Shea (admitted *pro hac vice*)
J. Dan Smith, III (admitted *pro hac vice*)
10 Cole B. Richter (admitted *pro hac vice*)
Michael P. Boyea (admitted *pro hac vice*)
11 Jae Y. Pak (admitted *pro hac vice*)

12 LEE SULLIVAN SHEA & SMITH LLP

13 *Attorneys for Defendant Sonos, Inc.*